<u>Index</u>

- Tab 1 Western Wireless' assertions regarding ROR regulation are without merit. The Commission should not risk the advances made in providing quality basic and advanced service to consumers in rural ILEC areas by giving credence to, and considering, in a separate proceeding, the specious assertions in the Western Wireless Petition.
- Tab 2 Rural ILEC sources of revenue (based on cost based ROR regulation) that are necessary to recover high costs and to provide quality basic and advanced services at affordable rate levels.
- Tab 3 A significant number of competitive carriers provide service in rural ILEC areas. ROR regulation is not a barrier to competitive entry.
- Tab 4 CMRS carriers do not provide quality service to rural ILEC service areas. There are significant areas where service is not provided. Even where service is provided, calls are frequently dropped and service quality is poor (static, one party can hear but the other party can't, etc.).
- Tab 5 Examples of intrastate audit adjustments that are due to differences in ratemaking philosophies between the federal and intrastate jurisdictions, not waste, fraud and abuse as claimed by Western Wireless.
- Tab 6 Kansas Commission Staff concerns regarding Western Wireless' ETC service and receipt of universal service funding in Kansas.
- Tab 7 CMRS ETC carriers, not ROR ILECs, are abusing the funds by receiving unwarranted funding that is unneeded to support their costs.
- Tab 8 Wireless carriers are receiving support funds, even though (at odds with the Act) their service rates and included local usage do not meet any reasonable affordability standard and the funding is not required to support their costs.
- Tab 9 Example of the types of procedures followed by ROR ILECs to insure that non-regulated costs are properly assigned and that cross-subsidies do not occur.
- Tab 10 Equal access should be a requirement for all ETCs. CMRS carriers are likely not really concerned with interexchange competition and the welfare of customers making those calls, because CMRS carriers have opposed equal access wireless competition that would benefit customers.